

### **REMARKS**

Applicants thank Examiner for the thorough consideration given to the claims in the present application. Claims 7 – 23 are cancelled in the present application. Claims 24 and 25 are pending in the present application. Claims 24 and 25 are independent claims. Claims 24 and 25 are amended by this response.

#### **Rejections under 35 U.S.C. § 102**

Claims 24 and 24 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,481,553 to Suzuki (hereafter “Suzuki”). Claims 24 and 24 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,353,062 to Maeda (hereafter “Maeda”). Claims 24 and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 5,767,911 to Boon (hereafter “Boon”). Insofar as they pertain to the presently pending claims, these rejections are respectfully traversed.

#### **Claim 24**

Claim 24 pertains to a moving picture prediction system that comprises, in pertinent part, “a plurality of memories that store picture data as a reference for prediction, the plurality of memories being allocated in a reference picture memory area.”

Suzuki teaches a plurality of memories (Fig. 1, 112A – 112D), one of which is selected by a selector (Fig. 1, 111) to receive a reconstructed picture block (Fig. 1, S5). A readout address generator (Fig. 1, 114) feeds a readout address to the memories based on a prediction mode signal and motion vector provided by a prediction mode determination unit (Fig. 1, 115). The reconstructed picture block is then read out. (Col. 4, lines 56 – 63).

Maeda uses plural image memories (Fig. 1, 13a, 13b, 14). The memories (Fig. 1, 13a, 13b) are controlled so that one reads while the other writes. Prediction is performed using memory 14 and one of memories 13a or 13b. (Col. 5, lines 11, 68).

Boon teaches a system and method for mitigating the accumulation of prediction error over time. (Col. 2, lines 40-45). Boon uses a first frame memory (Fig. 1, 342) for storing template images and a second frame memory (Fig. 1, 340) for storing previously processed images. These images are used for the prediction of input signals.

Applicants respectfully submit that while they do each disclose a plurality of memories, none of the above references teach or suggest that the plurality of memories are “allocated in a reference picture memory area” as required by independent claim 24. Applicants respectfully submit that the concept of such a reference picture memory area is wholly missing from Suzuki, Maeda, and Boon.

#### Claim 25

Claim 25 pertains to a method for predicting a moving picture that comprises, in pertinent part, “generating a predicted picture by using the picture data stored in a plurality of memories based upon the parameter, the plurality of memories being allocated in a reference picture memory area.”

Applicants respectfully submit that for at least the same reasons as stated with respect to claim 24, Suzuki, Maeda, and Boon are deficient in their teachings with respect to claim 25. Applicants respectfully submit that the concept of “a reference picture memory area” as required by independent claim 25 is wholly missing from the teachings of Suzuki, Maeda, and Boon.

#### Summary

At least in view of the above, Applicants respectfully submit that Suzuki, Maeda, and Boon are each deficient in their teachings with respect to independent claims 24 and 25. Specifically, Applicants respectfully submit that none of the above-mentioned references teach or suggest a “reference picture memory area” as required by independent claims 24 and 25.

**Conclusion**

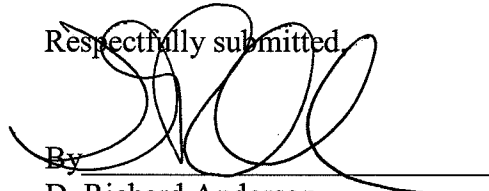
In view of the above remarks, it is believed that claims are allowable.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact D. Richard Anderson, Reg. No. 40,439 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

Dated: **October 9, 2008**

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'D. Richard Anderson', written over a horizontal line.

By  
D. Richard Anderson  
Registration No.: 40,439  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
8110 Gatehouse Road  
Suite 100 East  
P.O. Box 747  
Falls Church, Virginia 22040-0747  
(703) 205-8000  
Attorney for Applicants